

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Minnesota Chamber of Commerce, a Court File No. 23-cv-02015 (ECT/JFD)
Minnesota nonprofit corporation,

Plaintiff,
vs.

John Choi, et al.,

Defendants.

WHEREAS, on September 13, 2023, the Court issued its initial Pretrial Scheduling Order (ECF No. 51) in this matter; and

WHEREAS, the Scheduling Order sets a deadline for completion of fact discovery of January 17, 2024; and

WHEREAS, the parties have been working to complete discovery prior to January 17; however, due to the timing of document productions and availability for party and third-party depositions, the parties believe there is good cause to amend the pre-trial scheduling order to extend deadlines (other than the trial-ready date) by approximately one month,

IT IS THEREFORE STIPULATED AND AGREED BY AND BETWEEN THE PARTIES, THROUGH THEIR RESPECTIVE COUNSEL, THAT THE COURT AMEND THE SCHEDULING ORDER AS FOLLOWS:

1. Fact depositions noticed on or before January 2, 2024, shall be commenced in time to be completed on or before February 20, 2024;

**STIPULATION TO AMEND
SCHEDULING ORDER**

2. The identity of any witness a party may use at trial to present evidence pursuant to Federal Rule of Evidence 702, 703, or 705 must be disclosed on or before March 19, 2024;
3. The initial expert report completed in accordance with Fed. R. Civ. P. 26(a)(2)(B) must be served on or before March 19, 2024;
4. The identity of any witness who may testify solely to contradict or rebut evidence on the same subject matter identified by another party under Federal Rule of Civil Procedure 26(a)(2)(B) or (C) must be disclosed on or before April 19, 2024;
5. Any rebuttal expert's written report completed in accordance with Fed. R. Civ. P. 26(a)(2)(B) must be served on or before April 19, 2024;
6. Expert discovery, including depositions, shall be completed by May 20, 2024;
7. Non-dispositive motions and supporting documents which relate to fact discovery or related matters shall be filed and served on or before February 20, 2024;
8. Non-dispositive motions and supporting documents which relate to expert discovery shall be filed and served on or before May 20, 2024; and
9. All dispositive motions must be filed and served by the moving party on or before July 19, 2024.

NOW, THEREFORE, the parties respectfully request that the Court enter the proposed order submitted with this stipulation or equivalent order.

Dated: January 4, 2024

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Dated: January 4, 2024

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Dated: January 4, 2024

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